

**GERSTMAN SCHWARTZ**<sup>LLP</sup>  
ATTORNEYS AT LAW

November 9, 2020

**VIA CM/ECF & EMAIL**

The Honorable Victor Marrero ([chambersnysdmarrero@nysd.uscourts.gov](mailto:chambersnysdmarrero@nysd.uscourts.gov))  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *National Coalition on Black Civil Participation et al. v. Wohl et al.*, United States  
District Court, Southern District of New York, Case No. 1:20-cv-08668

Dear Judge Marrero:

We submit this joint letter on consent of all parties, pursuant to Your Honor's Individual Practices Rule I(F), to respectfully request an extension of Defendants' time to file an answer or otherwise respond to Plaintiffs' Complaint. This is Defendants' first request for such an extension.

Currently, Defendants Jack Burkman's, J.M. Burkman & Associates, LLC, and Project 1599's deadline to file an answer or otherwise respond is November 11, 2020; Defendant Jacob Wohl's deadline is November 12, 2020. On consent of all parties, we respectfully request that, 1) Defendants be afforded until December 3, 2020 to file an answer or otherwise respond to Plaintiffs' Complaint; 2) Plaintiffs be afforded until January 7, 2021 to file its opposition to a motion to dismiss or to file an amended Complaint; and 3) to the extent relevant/necessary, Defendants be afforded until January 22, 2021 to file a reply.

The parties further consent that Defendants will not oppose Plaintiffs' request to file an amended Complaint.

Thank you for Your Honor's consideration.

Respectfully Submitted,

/s/ David M. Schwartz

/s/ Randy E. Kleinman

cc: All counsel of record (via ECF)